

TABLE I

Todd A. Allen
Summary of Economic Loss

	<u>Present Value</u>	
Past Period		
Earnings	\$100,000	
Household Services	<u>29,000</u>	
Total	\$129,000	6/14/04 Present Value
Future Period		
Earnings	\$430,000	
Pension	297,000	
Household Services	<u>164,000</u>	
Total	\$891,000	6/25/07 Present Value
Total Past and Future	\$1,020,000	

From TABLES II-VI.

May 2007

TABLE II

Todd A. Allen
Earnings
Past Period

<u>Year</u>	<u>Earnings</u>	<u>Supplemental Pension</u>	<u>- Union Dues</u>	<u>- Personal Consumption</u>	<u>Payroll Tax</u>	<u>- Income Tax</u>	<u>= Net Loss</u>
.7 2003	\$40,108	-	\$1,498	\$17,923	\$3,068	\$3,358	\$14,261
1.0 2004	57,904	-	2,158	21,367	4,430	5,121	24,828
1.0 2005	60,026	-	2,222	22,150	4,592	5,334	25,728
1.0 2006	61,321	-	2,261	22,627	4,691	5,413	26,329
.5 2007	31,667	\$1,212	1,161	12,132	1,169	2,400	16,017

<u>Year</u>	<u>Net Loss From Above</u>	<u>x</u>	<u>Present Value Factor</u>	<u>=</u>	<u>Present Value</u>
2003	\$14,261		1.0000		\$14,261
2004	24,828		.9764		24,242
2005	25,728		.9308		23,948
2006	26,329		.8873		23,362
2007	16,017		.8663		13,876
Total June 14, 2004 Present Value					\$99,689
Rounded					= \$100,000

See Accompanying Notes.

May 2007

TABLE III

Todd A. Allen
Earnings
Future Period

<u>Year</u>	<u>Earnings</u>	<u>Supplemental</u> <u>+ Pension</u>	<u>-</u>	<u>Union</u> <u>Dues</u>	<u>-</u>	<u>Personal</u> <u>Consumption</u>	<u>-</u>	<u>Payroll</u> <u>Tax</u>	<u>=</u>	<u>Net Loss</u>
.5 2007	\$31,667	\$1,212		\$1,161		\$12,132		\$2,423		\$17,163
1.0 2008	64,473	2,450		2,355		24,695		4,932		34,941
1.0 2009	65,634	2,494		2,390		25,139		5,021		35,578
1.0 2010	66,815	2,539		2,424		25,592		5,111		36,227
1.0 2011	68,018	2,585		2,462		26,053		5,203		36,885
1.0 2012	69,242	2,631		2,498		26,521		5,297		37,557
1.0 2013	70,488	2,679		2,536		26,999		5,392		38,240
1.0 2014	71,757	2,727		2,574		27,485		5,489		38,936
1.0 2015	73,049	2,776		2,612		27,979		5,588		39,646
1.0 2016	74,364	2,826		2,652		28,483		5,689		40,366
1.0 2017	75,703	2,877		2,692		28,996		5,791		41,101
1.0 2018	77,066	2,929		2,733		29,518		5,896		41,848
1.0 2019	78,453	2,981		2,775		30,049		6,002		42,608
1.0 2020	79,865	3,035		2,817		30,590		6,110		43,383
1.0 2021	81,303	3,090		2,860		32,981		6,220		42,332
1.0 2022	82,766	3,145		2,904		41,065		6,332		35,610
1.0 2023	84,256	3,202		2,949		41,805		6,446		36,258
.2 2024	17,155	652		599		8,512		1,312		7,384

TABLE CONTINUED

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TABLE III - CONTINUED

Todd A. Allen
Earnings
Future Period

<u>Year</u>	<u>Net Loss</u> <u>From Prior Page</u>	<u>x</u>	<u>Present</u> <u>Value Factor</u>	<u>=</u>	<u>Present Value</u>
2007	\$17,163		.9764		\$16,758
2008	34,941		.9308		32,523
2009	35,578		.8873		31,568
2010	36,227		.8458		30,641
2011	36,885		.8063		29,740
2012	37,557		.7687		28,870
2013	38,240		.7328		28,022
2014	38,936		.6985		27,197
2015	39,646		.6659		26,400
2016	40,366		.6348		25,624
2017	41,101		.6051		24,870
2018	41,848		.5769		24,142
2019	42,608		.5499		23,430
2020	43,383		.5242		22,741
2021	42,332		.4998		21,158
2022	35,610		.4764		16,965
2023	36,258		.4542		16,468
2024	7,384		.4498		<u>3,321</u>
Total June 25, 2007 Present Value					\$430,438
Rounded					= \$430,000

See Accompanying Notes.

May 2007

TABLE IV

Todd A. Allen
Defined Benefit Pension
Future Period

<u>Year</u>	<u>Pension</u>	-	<u>Personal Consumption</u>	=	<u>Net Loss</u>	x	<u>Present Value Factor</u>	=	<u>Present Value</u>
.8 2024	\$61,042		\$18,923		\$42,119		.4329		\$18,233
1.0 2025	76,303		23,654		52,649		.4127		21,728
1.0 2026	76,303		23,654		52,649		.3934		20,712
1.0 2027	76,303		23,654		52,649		.3751		19,749
1.0 2028	76,303		23,654		52,649		.3575		18,822
1.0 2029	76,303		23,654		52,649		.3408		17,943
1.0 2030	76,303		23,654		52,649		.3249		17,106
1.0 2031	76,303		23,654		52,649		.3097		16,305
1.0 2032	76,303		23,654		52,649		.2953		15,547
1.0 2033	76,303		23,654		52,649		.2815		14,821
1.0 2034	76,303		23,654		52,649		.2683		14,126
1.0 2035	76,303		23,654		52,649		.2558		13,648
1.0 2036	76,303		23,654		52,649		.2439		12,841
1.0 2037	76,303		23,654		52,649		.2325		12,241
1.0 2038	76,303		23,654		52,649		.2216		11,667
1.0 2039	76,303		23,654		52,649		.2112		11,119
1.0 2040	76,303		23,654		52,649		.2014		10,604
1.0 2041	76,303		23,654		52,649		.1920		10,109
1.0 2042	76,303		23,654		52,649		.1830		9,635
1.0 2043	76,303		23,654		52,649		.1745		9,187
.1 2044	7,630		2,365		5,265		.1736		<u>914</u>
Total June 25, 2007 Present Value									\$297,057
Rounded									= \$297,000

See Accompanying Notes.

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TABLE V

Todd A. Allen
Household Services
Past Period

<u>Year</u>	<u>Hours</u>	x	<u>Hourly Rate</u>	=	<u>Value</u>	-	<u>Personal Consumption</u>	=	<u>Net Loss</u>	x	<u>Present Value Factor</u>	=	<u>Present Value</u>
.7 2003	419		\$14.01		\$5,870		\$1,686		\$4,184		1.0000		\$4,184
1.0 2004	660		14.71		9,709		2,320		7,389		.9764		7,215
1.0 2005	660		15.55		10,263		2,453		7,810		.9308		7,270
1.0 2006	660		15.88		10,481		2,505		7,976		.8873		7,077
.5 2007	330		16.21		5,349		1,278		4,071		.8663		<u>3,527</u>
Total June 14, 2004 Present Value													\$29,273
Rounded =													\$29,000

See Accompanying Notes.

May 2007

TABLE VI

Todd A. Allen
Household Services
Future Period

<u>Year</u>	<u>Hours</u>	x	<u>Hourly Rate</u>	=	<u>Value</u>	-	<u>Personal Consumption</u>	=	<u>Net Loss</u>	x	<u>Present Value Factor</u>	=	<u>Present Value</u>
.5 2007	330		\$16.21		\$5,349		\$1,278		\$4,071		.9764		\$3,975
1.0 2008	660		16.55		10,923		2,611		8,312		.9308		7,737
1.0 2009	660		16.90		11,154		2,666		8,488		.8873		7,531
1.0 2010	660		17.25		11,385		2,721		8,664		.8458		7,328
1.0 2011	660		17.61		11,623		2,778		8,845		.8063		7,132
1.0 2012	660		17.98		11,867		2,836		9,031		.7687		6,942
1.0 2013	660		18.36		12,118		2,896		9,222		.7328		6,758
1.0 2014	660		18.75		12,375		2,958		9,417		.6985		6,578
1.0 2015	660		19.14		12,632		3,019		9,613		.6659		6,401
1.0 2016	660		19.54		12,896		3,082		9,814		.6348		6,230
1.0 2017	660		19.95		13,167		3,147		10,020		.6051		6,063
1.0 2018	660		20.37		13,444		3,213		10,231		.5769		5,902
1.0 2019	660		20.80		13,728		3,281		10,447		.5499		5,745
1.0 2020	660		21.24		14,018		3,350		10,668		.5242		5,592
1.0 2021	643		21.69		13,947		3,531		10,416		.4998		5,206
1.0 2022	573		22.15		12,692		3,935		8,757		.4764		4,172
1.0 2023	573		22.62		12,961		4,018		8,943		.4542		4,062
1.0 2024	919		23.10		21,229		6,581		14,648		.4329		6,341
1.0 2025	954		23.59		22,505		6,977		15,528		.4127		6,408
1.0 2026	903		24.09		21,753		6,743		15,010		.3934		5,905
1.0 2027	852		24.60		20,959		6,497		14,462		.3751		5,425
1.0 2028	801		25.12		21,121		6,238		13,883		.3575		4,963
1.0 2029	750		25.65		19,238		5,964		13,274		.3408		4,524
1.0 2030	699		26.19		18,307		5,675		12,632		.3249		4,104

TABLE CONTINUED

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TABLE VI - CONTINUED

Todd A. Allen
Household Services
Future Period

<u>Year</u>	<u>Hours</u>	x	<u>Hourly Rate</u>	=	<u>Value</u>	-	<u>Personal Consumption</u>	=	<u>Net Loss</u>	x	<u>Present Value Factor</u>	=	<u>Present Value</u>
1.0 2031	648		\$26.74		\$17,328		\$5,372		\$11,956		.3097		\$3,703
1.0 2032	597		27.30		16,298		5,052		11,246		.2953		3,321
1.0 2033	546		27.87		15,217		4,717		10,500		.2815		2,956
1.0 2034	495		28.46		14,088		4,367		9,721		.2683		2,608
1.0 2035	444		29.06		12,903		4,000		8,903		.2558		2,277
1.0 2036	393		29.67		11,660		3,615		8,045		.2439		1,962
1.0 2037	342		30.29		10,359		3,211		7,148		.2325		1,662
1.0 2038	291		30.93		9,001		2,790		6,211		.2216		1,376
1.0 2039	240		31.58		7,579		2,349		5,230		.2112		1,105
1.0 2040	189		32.24		6,093		1,889		4,204		.2014		847
1.0 2041	138		32.92		4,543		1,408		3,135		.1920		602
1.0 2042	87		33.61		2,924		906		2,018		.1830		369
1.0 2043	36		34.32		1,236		383		853		.1745		149
.1 2044	-		35.04		-		-		-		.1736		-
Total June 25, 2007 Present Value													\$163,961
Rounded												=	\$164,000

See Accompanying Notes.

May 2007

Notes To Accompany Todd A. Allen - Economic Loss:

- 1.) Date of Birth: March 30, 1967
- 2.) Date of Death: April 20, 2003 at age 36.1
- 3.) Date of Complaint: June 14, 2004
- 4.) Date of Trial: June 25, 2007
- 5.) Dependents:

	<u>Date of Birth</u>	<u>Age at Date of Death</u>
Spouse	May 16, 1970	32.9
Daughter	October 18, 2003	0

- 6.) Remaining Statistical Life Expectancy as of Date of Death:

Decedent - 40.8 years to age 76.9

Spouse - 48.4 years to age 81.3

From National Center for Health Statistics, United States Life Tables, 2003, Vol. 54, No. 14, Apr 2006, Tables 2 (males) and 3 (females).

- 7.) Worklife:

To age 57. Normal retirement age for Laborers Union. From Summary Plan Description, Alaska Laborers-Employers Retirement Fund, May 2004.

- 8.) Earnings:

At straight time hourly rates of \$20.79 (2003), \$21.01 (2004), \$21.78 (2005), \$22.25 (2006), and \$22.98 (2007). Earnings shown in the tables are at 2,756 straight time equivalent (STE) hours/year.

Straight time rates are from Laborers' Local 341. STE hours are computed as 84 hours/week (40 straight time and 44 overtime) for 26 weeks/year. Work schedule from TCC Personnel Action Notice Forms Bate Stamped 0002-0007.

May 2007

9.) Union Dues

\$26 monthly dues. Working dues at 3% of gross plus 5¢/hour. From Laborers' Local 341.

10.) Pension Benefit:

Defined Benefit Pension - Monthly benefit is 2% of total employer contributions. Employer contributions on 2,184 hours/year. Contribution rate on compensable hours at \$5.50/hour in 2003, 2004, and 2005, \$5.75/hour in 2006, \$6.25/hour in 2007, and 21.6% of earnings thereafter.

Pension formula is from Summary Plan Description cited in note 7. Hourly contribution rates from Laborers' Local 341. Compensable hours/year computed as 84 hours/week, 26 weeks/year. 21.6% is the 2007 pension contribution rate expressed as a percent of 2007 earnings.

Defined Contribution (Supplemental) Pension - Contribution is \$1.11 per compensable hour (2,184/year) in 2007. After 2007 the contribution is computed as 3.8% of earnings.

11.) Household Services:

At 660 hours/year until daughter reaches age 18, then at 573 hours/year until retirement, then at 1,005 hours/year declining linearly (to account for the debilitating effects of age) throughout his statistically remaining life.

Hours are from Juster, Time, Goods, and Well-Being, University of Michigan 1985, Table 7.3. Hours are for a married man working full-time with child care (660 hours/year), working full-time without child care (573 hours/year), and not working without child care (1,005 hours/year).

Hourly rate at \$14.01 (2003), \$14.71 (2004) and \$15.55 (2005). Average wages for Community and Social Services Occupations, Healthcare Support Occupations, Food Preparation and Serving Related Occupations, Building and Grounds, Cleaning, and Maintenance Occupations, Personal Care and Service Occupations, and Office and Administrative Support Occupations. 2003 and 2004 are for the Railbelt Region, 2005 is for the Balance of State Region. From Bureau of Labor Statistics, Alaska Wage Rates, 2003, 2004, and 2005. 2005 is available online at: <http://almis.labor.state.ak.us/>

May 2007

12.) Personal Consumption:

Rate is a function of family size and is applied to family income, not just the decedent's.

Statistical rates shown below are for one adult and are the average of 17 studies of multiperson families compiled and published in Martin, Determining Economic Damages, James Publishing, Rev. 17, Jul 2005, p. 5-5.

Adjustment for family income is based upon the 2003 (full year) ratio of decedent's to family earnings (64.8%). No retirement income is assumed for Mrs. Allen and statistical rates are applied to household services.

<u>Family Size</u>	<u>Statistical Rate</u>	<u>Adjusted To Family Income</u>
3 Person	23.9%	36.9%
2 Person	31.0%	47.8%

13.) Payroll Tax:

At statutory rate of 7.65% of earnings. From Social Security Administration, 2005 Annual Statistical Supplement to the Social Security Bulletin, SSA Publication No. 13-11700, Feb 2006, Table 2.A3.

14.) Income Tax:

At statutory rates (married, standard deduction, three personal exemptions). From file data.

15.) Growth Rate:

Earnings rate at 1.8%. From Mr. Allen's 2000 date of hire to 2007, straight time hourly rates increased at an average annual rate of 1.7%. During the same time period the CPI-W increased at an average annual rate of 2.6%. Applying the ratio of the two (65.4%) to the forecast rate of increase in the CPI-W (2.8%) over the future loss period yields an expected rate of increase of 1.8%.

Household services rate at 2.1%. During the 1995-2005 time period average wages in the Valdez-Cordova Census Area increased at an average annual rate of 1.9%. During the same time period the CPI-W increased at an average annual rate of 2.5%. Applying the ratio of the two (76.0%) to the forecast rate of increase in the CPI-W (2.8%) over the May 2007

future loss period yields an expected rate of increase of 2.1%.

Historic wage rates are from Laborers' Local 341.

Historic Valdez-Cordova Census Area wages are from Alaska Dept. of Labor, Employment & Earnings Summary Report, 1995 and 2005. 2005 is available online at: <http://almis.labor.state.ak.us/>

Historic CPI-W rates are from Bureau of Labor Statistics, CPI Detailed Report, Mar 2007, Table 27.

Forecast rate of increase in the CPI-W is from Social Security Administration, 2007 Annual Report of the Board of Trustees, Apr 2007, Table V.B1. Available online at <http://www.ssa.gov/OACT/TR/TR07/index.html>

16.) Discount Rate:

4.9% Prevailing rate (month ended May 11, 2007) on long-term (10 or more years) government securities. Rates are from U.S. Treasury and are available online at: <http://www.treas.gov/offices/domestic-finance/debt-management/interest-rate/index.html>

May 2007

TABLE A

Presley and Kimberly Allen Social Security Receipts
Summary

Present Value

Past Period

Presley	\$37,204	
Kimberly	<u>15,425</u>	
Total Past	\$52,629	6/14/04 Present Value

With No Future
Employment By Kimberly

With Kimberly Future
Employment in 2010

Future Period

Presley	\$143,556	\$143,556
Kimberly	<u>125,965</u>	<u>75,052</u>
Total Future	\$269,521	\$218,608

6/25/07 Present Value

Total Past and Future	\$322,150	\$271,237
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From TABLES B-F

TABLE B
 Presley Allen
 Social Security Receipts
Past Period

<u>Year</u>	<u>Social Security Receipts</u>	<u>Present Value Factor</u>	<u>= Present Value</u>
2003	\$1,732	1.0000	\$1,732
2004	10,832	.9764	10,576
2005	11,100	.9308	10,332
2006	11,556	.8873	10,254
2007 (5 months)	4,975	.8663	<u>4,310</u>
Total June 14, 2004 Present Value			\$37,204

See Computational Notes.

TABLE C
 Presley Allen
 Social Security Receipts
Future Period

<u>Year</u>	<u>Social Security Receipts</u>	<u>x</u>	<u>Present Value Factor</u>	<u>= Present Value</u>
2007 (7 months)	\$6,975		.9764	\$6,801
2008	12,167		.9308	11,325
2009	12,459		.8873	11,055
2010	12,795		.8458	10,822
2011	13,153		.8063	10,605
2012	13,521		.7687	10,394
2013	13,900		.7328	10,186
2014	14,289		.6985	9,981
2015	14,689		.6659	9,781
2016	15,100		.6348	9,585
2017	15,523		.6051	9,393
2018	15,958		.5769	9,206
2019	16,405		.5499	9,021
2020	16,864		.5242	8,840
2021 (9 months)	13,002		.5046	6,561
Total June 25, 2007 Present Value				\$143,556

See Computational Notes.

TABLE D

Kimberly Allen
Social Security Receipts
Past Period

<u>Year</u>	<u>Social Security Receipts</u>	<u>Present Value Factor</u>	<u>= Present Value</u>
2003	-	1.0000	-
2004	-	.9764	-
2005	\$925	.9308	\$861
2006	11,556	.8873	10,254
2007 (5 months)	4,975	.8663	<u>4,310</u>
Total June 14, 2004 Present Value			\$15,425

See Computational Notes.

TABLE E

Kimberly Allen
Social Security Receipts With No Future Employment
Future Period

<u>Year</u>	<u>Social Security Receipts</u>	<u>Present Value Factor</u>	<u>= Present Value</u>
2007 (7 months)	\$6,975	.9764	\$6,801
2008	12,167	.9308	11,325
2009	12,459	.8873	11,055
2010	12,795	.8458	10,822
2011	13,153	.8063	10,605
2012	13,521	.7687	10,394
2013	13,900	.7328	10,186
2014	14,289	.6985	9,981
2015	14,689	.6659	9,781
2016	15,100	.6348	9,585
2017	15,523	.6051	9,393
2018	15,958	.5769	9,206
2019 (9 months)	12,304	.5552	<u>6,831</u>
Total June 25, 2007 Present Value			\$125,965

See Computational Notes.

TABLE F

Kimberly Allen
 Social Security Receipts With Future Employment Beginning 2010
Future Period

<u>Year</u>	<u>Social Security Receipts</u>	<u>Present Value Factor</u>	<u>= Present Value</u>
2007 (7 months)	\$6,975	.9764	\$6,801
2008	12,167	.9308	11,325
2009	12,459	.8873	11,055
2010	6,064	.8458	5,129
2011	6,234	.8063	5,026
2012	6,409	.7687	4,927
2013	6,588	.7328	4,828
2014	6,772	.6985	4,730
2015	6,962	.6659	4,636
2016	7,157	.6348	4,543
2017	7,357	.6051	4,452
2018	7,563	.5769	4,363
2019 (9 months)	5,831	.5552	<u>3,237</u>
Total June 25, 2007 Present Value			\$75,052

See Computational Notes.

Computational Notes To Accompany Social Security Receipts:

- 1.) Receipts for 2003 through 2006 are from Social Security Administration 1099's.
- 2.) Future receipts are assumed to increase at the Social Security Administration actuarial forecast rate of increase in the CPI-W with a lag of one year. e.g., 2007 receipts are increased at the 2006 rate of increase in the CPI-W (3.3%), 2008 receipts are increased by the 2007 forecast rate of increase in the CPI-W (1.9%), etc. Forecast rates are from the source cited in economic note 15.
- 3.) Presley will receive her social security survivor's benefit until she reaches age 18. Kimberly will receive her survivor's benefit until Presley reaches age 16. See explanatory materials applicable to survivors on the Social Security Administration website <http://www.ssa.gov>.
- 4.) Kimberly's benefit will be reduced by \$1 for each \$2 of earnings above the Social Security Earnings Test Exempt Amount (\$12,960 in 2007). See Social Security How Work Affects Your Benefits and related explanatory materials applicable to survivors available on the Social Security Administration website cited above.
- 5.) In the alternative assuming Kimberly returns to work in 2010, her earnings are assumed to begin at the same amount that she earned in 2005 (\$27,351). Her earnings are then assumed to increase at the same rate of inflation as social security benefits.
- 6.) Discounting to present value is at 4.9% as described in economic note 16.